

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ZENIMAX MEDIA INC. and §
ID SOFTWARE LLC, §
Plaintiffs, § **CIVIL CASE NO. 3:14-cv-01849-P**
v. §
OCULUS VR, LLC, §
PALMER LUCKEY, §
and FACEBOOK, INC. §
Defendants. §

**ZENIMAX APPENDIX (VOL. 1) TO ITS OPPOSITION TO
DEFENDANTS' MOTION FOR PROTECTIVE ORDER AND TO QUASH**

VOL. 1

<u>DOCUMENT</u>	<u>EXHIBIT</u>	<u>PAGE(S)</u>
Letter from P. Anthony Sammi to G. Howard regarding Facebook-Oculus merger (dated July 22, 2014)	1	1-2
Letter from P. Anthony Sammi to G. Howard regarding Facebook-Oculus merger (dated July 24, 2014)	2	3-4
Letter and attachments from G. Howard to P. Anthony Sammi regarding production of documents related to Facebook-Oculus merger, dated July 25, 2014	3	5-18
Email and attachments from J. Dalton to P. Anthony Sammi regarding production of documents related to Facebook-Oculus merger, dated July 28, 2014	4	19-39
Oculus VR, LLC (Successor By Merger To Oculus VR, Inc.) and Palmer Luckey's Initial Disclosures, dated July 23, 2014	5	40-49
Letter from J. Dalton to K. Hemr attaching Defendants' First Set of Interrogatories and Requests for Production of Documents and Things to Plaintiffs, dated July 11, 2014	6	50-89

Defendants' Second Set of Interrogatories To Plaintiffs (Interrogatories Nos. 6-8), dated August 1, 2014	7	90-100
Letter from P. Anthony Sammi to G. Howard attaching Plaintiffs' responses to Defendants' First Set of Interrogatories and Requests for Production, dated August 11, 2014	8	101-222
Letter from P. Anthony Sammi to G. Howard attaching Plaintiffs' responses to Defendants' First and Second Set of Interrogatories, dated August 29, 2014	9	223-261
Letter from J. Pak to G. Howard regarding Plaintiffs' first production of documents, dated August 22, 2014	10	262-263
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' second production of documents, dated September 5, 2014	11	264-266
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' third production of documents, dated September 11, 2014	12	267-268
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' fourth production of documents, dated September 18, 2014	13	269-270
Letter from P. Anthony Sammi to G. Howard regarding Plaintiffs' fifth production of documents, dated September 26, 2014	14	271-272
Declaration of P. Anthony Sammi, dated October 1, 2014	15	273-276
E-mail chain between J. Dalton and P. Anthony Sammi regarding meet and confer on motion to compel, motion for protective order, discovery as to Defendant Facebook, Inc., and identification of trade secrets, dated September 11, 2014	16	277-280
Letter from P. Anthony Sammi to G. Howard regarding Defendants' August 22, 2014 letter on Plaintiffs' responses to Defendants' First Set of Interrogatories, dated August 28, 2014	17	281-285
Email from John Carmack to Director of Information Technology at id Software, Duncan Welch, regarding "outside line?", dated August 10, 2011	18	286-287

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Dated: October 1, 2014

Respectfully submitted,

s/ Phillip B. Philbin

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CERTIFICATE OF SERVICE

On October 1, 2014, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case files system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

Dated: October 1, 2014

s/ Phillip B. Philbin

Phillip B. Philbin